

UNITED STATES DISTRICT COURT

NOV 29 2016

for the

Eastern District of California

MATTHEW J. DYKMAN
 CLERK

United States of America
 v.

Randal Gordon Paul
 Date of Birth: XX/XX/1968
 SSN: XXX-XX-4185

Defendant(s)

Case No. Mj 16-4221

CRIMINAL COMPLAINT

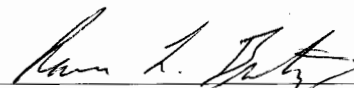
I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 6/14/2015 and 11/16/2016 in the county of Bernalillo in the
 State and District of New Mexico, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 2252A(a)(2)(A)	Distribution of child pornography
18 U.S.C. § 2252A(a)(5)(B)	Possession of child pornography

This criminal complaint is based on these facts:

(see attachment)

☒ Continued on the attached sheet.


Complainant's signature

Aaron L. Estein, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: November 29th, 2016City and state: Albuquerque NM


Judge's signature

KAREN B. MOLZEN
 U.S. MAGISTRATE JUDGE

Printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

IN THE MATTER OF THE
UNITED STATES OF AMERICA
V.
RANDAL PAUL
YEAR OF BIRTH: 1968
SSAN: XXX-XX-4185

Case No. _____

Filed Under Seal

**AFFIDAVIT IN SUPPORT OF
A CRIMINAL COMPLAINT AND AN ARREST WARRANT**

I, Aaron Butzin, having been first duly sworn, do hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I have been employed as a Special Agent of the FBI since June, 2014, and am currently assigned to the Albuquerque Division of the FBI, Cyber Squad. While employed by the FBI, I have investigated federal criminal violations related to high technology or cyber crime, child exploitation, and child pornography. I have gained experience through training and everyday work relating to conducting these types of investigations. I have received training in the area of child pornography and child exploitation and have had the opportunity, in the course of my work, to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media. Prior to becoming a Special Agent of the FBI, I earned a Bachelor's degree in Computer Science and worked as a software engineer for 10 years. The information set forth in this affidavit has been derived from my own investigation or communicated to me by other sworn law enforcement officers or from reliable sources.

2. This affidavit will show that there is probably cause in support of a criminal complaint against Randal Paul (year of birth 1968, Social Security account number xxx-xx-4185), for violation of 18 U.S.C. § 2252A(a)(2)(A) and (b)(1) (receipt and distribution of, conspiracy to receive and distribute, and attempt to receive and distribute child pornography); and 18 U.S.C. § 2252A(a)(5)(B)

and (b)(2) (possession of, knowing access, conspiracy to access, or attempted access with intent to view child pornography).

3. The statements contained in this affidavit are based in part on: information provided by FBI Special Agents; written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents, information gathered from the service of administrative subpoenas; the results of physical and electronic surveillance conducted by law enforcement agents; independent investigation and analysis by FBI agents/analysts and computer forensic professionals; and my experience, training and background as a Special Agent (SA) with the FBI. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint, your affiant has not included each and every fact known to me concerning this investigation. Instead, I have set forth only the facts that I believe are necessary to establish the necessary foundation for the criminal complaint.

RELEVANT STATUTES

4. This investigation concerns alleged violations of: 18 U.S.C. §§ 2252A(a)(2)(A), Receipt, Transportation, and Distribution, and Conspiracy to Receive, Transport, and Distribute, Child Pornography; and 18 U.S.C. § 2252A(a)(5)(B), Possession and Access, or Attempted Access, with Intent to View Child Pornography.

- a. 18 U.S.C. § 2252A(a)(2)(A) and (b)(1) prohibits a person from knowingly receiving, distributing or conspiring to receive or distribute any child pornography or any material that contains child pornography, as defined in 18 U.S.C. § 2256(8), that has been mailed, or using any means or facility of interstate or foreign commerce shipped or transported in or affecting interstate or foreign commerce by any means, including by computer; and

- b. 18 U.S.C. § 2252A(a)(5)(B) and (b)(2) prohibits a person from knowingly possessing or knowingly accessing with intent to view, or attempting to do so, any material that contains an image of child pornography, as defined in 18 U.S.C. § 2256(8), that has been mailed, or shipped or transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce by any means, including by computer, or that was produced using materials that have been mailed or shipped or transported in or affecting interstate or foreign commerce by any means, including by computer.

DEFINITIONS

- 5. The following definitions apply to this Affidavit and attachments hereto:

- a. “Bulletin Board” means an Internet-based website that is either secured (accessible with a password) or unsecured, and provides members with the ability to view postings by other members and make postings themselves. Postings can contain text messages, still images, video images, or web addresses that direct other members to specific content the poster wishes. Bulletin boards are also referred to as “internet forums” or “message boards.” A “post” or “posting” is a single message posted by a user. Users of a bulletin board may post messages in reply to a post. A message “thread,” often labeled a “topic,” refers to a linked series of posts and reply messages. Message threads or topics often contain a title, which is generally selected by the user who posted the first message of the thread. Bulletin boards often also provide the ability for members to communicate on a one-to-one basis through “private messages.” Private messages are similar to e-mail messages that are sent between two members of a bulletin board. They are accessible

only by the user who sent/received such a message, or by the Website Administrator.

- b. “Chat” refers to any kind of communication over the Internet that offers a real-time transmission of text messages from sender to receiver. Chat messages are generally short in order to enable other participants to respond quickly and in a format that resembles an oral conversation. This feature distinguishes chatting from other text-based online communications such as Internet forums and email.
- c. “Child Erotica,” as used herein, means materials or items that are sexually arousing to persons having a sexual interest in minors but that are not, in and of themselves, legally obscene or that do not necessarily depict minors in sexually explicit conduct.
- d. “Child Pornography,” as used herein, is defined in 18 U.S.C. § 2256(8) as any visual depiction of sexually explicit conduct where (a) the production of the visual depiction involved the use of a minor engaged in sexually explicit conduct, (b) the visual depiction is a digital image, computer image, or computer-generated image that is, or is indistinguishable from, that of a minor engaged in sexually explicit conduct, or (c) the visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaged in sexually explicit conduct.
- e. “Computer,” as used herein, is defined pursuant to 18 U.S.C. § 1030(e)(1) as “an electronic, magnetic, optical, electrochemical, or other high speed data processing device performing logical or storage functions, and includes any data storage facility or communications facility directly related to or operating in conjunction with such device.”
- f. “Computer Server” or “Server,” as used herein, is a computer that is attached to a dedicated network and serves many users. A web server, for example, is a computer

which hosts the data associated with a website. That web server receives requests from a user and delivers information from the server to the user's computer via the Internet. A domain name system ("DNS") server, in essence, is a computer on the Internet that routes communications when a user types a domain name, such as www.cnn.com, into his or her web browser. Essentially, the domain name must be translated into an Internet Protocol ("IP") address so the computer hosting the web site may be located, and the DNS server provides this function.

- g. "Computer hardware," as used herein, consists of all equipment which can receive, capture, collect, analyze, create, display, convert, store, conceal, or transmit electronic, magnetic, or similar computer impulses or data. Computer hardware includes any data-processing devices (including, but not limited to, central processing units, internal and peripheral storage devices such as fixed disks, external hard drives, floppy disk drives and diskettes, and other memory storage devices); peripheral input/output devices (including, but not limited to, keyboards, printers, video display monitors, and related communications devices such as cables and connections), as well as any devices, mechanisms, or parts that can be used to restrict access to computer hardware (including, but not limited to, physical keys and locks).
- h. "Computer software," as used herein, is digital information which can be interpreted by a computer and any of its related components to direct the way they work. Computer software is stored in electronic, magnetic, or other digital form. It commonly includes programs to run operating systems, applications, and utilities.
- i. "Computer-related documentation," as used herein, consists of written, recorded,

printed, or electronically stored material which explains or illustrates how to configure or use computer hardware, computer software, or other related items.

- j. “Computer passwords, pass-phrases and data security devices,” as used herein, consist of information or items designed to restrict access to or hide computer software, documentation, or data. Data security devices may consist of hardware, software, or other programming code. A password or pass-phrase (a string of alpha-numeric characters) usually operates as a sort of digital key to “unlock” particular data security devices. Data security hardware may include encryption devices, chips, and circuit boards. Data security software of digital code may include programming code that creates “test” keys or “hot” keys, which perform certain pre-set security functions when touched. Data security software or code may also encrypt, compress, hide, or “booby-trap” protected data to make it inaccessible or unusable, as well as reverse the process to restore it.
- k. “File Transfer Protocol” (“FTP”), as used herein, is a standard network protocol used to transfer computer files from one host to another over a computer network, such as the Internet. FTP is built on client-server architecture and uses separate control and data connections between the client and the server.
- l. “Host Name.” A Host Name is a name assigned to a device connected to a computer network that is used to identify the device in various forms of electronic communication, such as communications over the Internet;
- m. “Hyperlink” refers to an item on a web page which, when selected, transfers the user directly to another location in a hypertext document or to some other web page.

- n. The "Internet" is a global network of computers and other electronic devices that communicate with each other. Due to the structure of the Internet, connections between devices on the Internet often cross state and international borders, even when the devices communicating with each other are in the same state.
- o. "Internet Service Providers" ("ISPs"), as used herein, are commercial organizations that are in business to provide individuals and businesses access to the Internet. ISPs provide a range of functions for their customers including access to the Internet, web hosting, e-mail, remote storage, and co-location of computers and other communications equipment. ISPs can offer a range of options in providing access to the Internet including telephone based dial-up, broadband based access via digital subscriber line ("DSL") or cable television, dedicated circuits, or satellite based subscription. ISPs typically charge a fee based upon the type of connection and volume of data, called bandwidth, which the connection supports. Many ISPs assign each subscriber an account name – a user name or screen name, an "e-mail address," an e-mail mailbox, and a personal password selected by the subscriber. By using a computer equipped with a modem, the subscriber can establish communication with an Internet Service Provider ("ISP") over a telephone line, through a cable system, or via satellite, and can access the Internet by using his or her account name and personal password.
- p. "Internet Protocol address" or "IP address" refers to a unique number used by a computer to access the Internet. IP addresses can be "dynamic," meaning that the ISP assigns a different unique number to a computer every time it accesses the Internet. IP addresses might also be "static," if an ISP assigns a user's computer a particular IP

address which is used each time the computer accesses the Internet. IP addresses are also used by computer servers, including web servers, to communicate with other computers.

- q. Media Access Control (“MAC”) address. The equipment that connects a computer to a network is commonly referred to as a network adapter. Most network adapters have a MAC address assigned by the manufacturer of the adapter that is designed to be a unique identifying number. A unique MAC address allows for proper routing of communications on a network. Because the MAC address does not change and is intended to be unique, a MAC address can allow law enforcement to identify whether communications sent or received at different times are associated with the same adapter.
- r. “Minor” means any person under the age of eighteen years. See 18 U.S.C. § 2256(1).
- s. “Sexually explicit conduct” means actual or simulated (a) sexual intercourse, including genital-genital, oral-genital, or oral-anal, whether between persons of the same or opposite sex; (b) bestiality; (c) masturbation; (d) sadistic or masochistic abuse; or (e) lascivious exhibition of the genitals or pubic area of any person. See 18 U.S.C. § 2256(2).
- t. “URL” is an abbreviation for Uniform Resource Locator and is another name for a web address. URLs are made of letters, numbers, and other symbols in a standard form.

People use them on computers by clicking a pre-prepared link or typing or copying and pasting one into a web browser to make the computer fetch and show some specific resource (usually a web page) from another computer (web server) on the Internet.
- u. “Visual depictions” include undeveloped film and videotape, and data stored on computer disk or by electronic means, which is capable of conversion into a visual

image. See 18 U.S.C. § 2256(5).

- v. “Website” consists of textual pages of information and associated graphic images. The textual information is stored in a specific format known as Hyper-Text Mark-up Language (“HTML”) and is transmitted from web servers to various web clients via Hyper-Text Transport Protocol (“HTTP”);
- w. “Recovery E-mail Address” is a second e-mail address, provided to an e-mail provider by the user, to assist in recovering access to an e-mail account if the user forgets their password or is locked out of the account for some other reason. The recovery e-mail address is often provided by the user at the creation of the account, but many providers allow a user to add one at any time once the account is set up.
- x. “Keystroke Logger” or “Keylogger” is software or hardware that tracks keystrokes and keyboard events, usually surreptitiously or secretly, to monitor actions by the user of an information system.
- y. “Unallocated Space” or “Slack Space” on a computer disk is space to which the operating system, e.g. Windows, can write. It is space that has either never been written to or space that was once written to, or “allocated”, but has since been de-allocated, or freed for future use. Data that was written, but subsequently deleted, may still exist in unallocated space until the operating system overwrites it.
- z. “Proxy” in a computer network, such as the internet, is a computer that acts as an intermediary for requests from clients seeking resources from other computers. In the case of the internet, it is possible for an individual to hide their IP address by using a proxy to make requests on your behalf.

BACKGROUND OF THE INVESTIGATION AND PROBABLE CAUSE

6. “Website A.”¹ was a child pornography bulletin board and website dedicated to the advertisement and distribution of child pornography and the discussion of matters pertinent to the sexual abuse of children, including the safety and security of individuals who seek to sexually exploit children online.

7. “Website A” operated on a network (“the Network”²) available to Internet users who are aware of its existence. The Network is designed specifically to facilitate anonymous communication over the Internet by routing internet requests and responses through servers all over the world. Thus, using “the Network”, would allow someone sitting in Albuquerque, New Mexico to appear as though they are actually in a different location, almost anywhere in the world.

8. An investigation conducted by the FBI, showed a user with the username “thedgains” and using the e-mail address thedgains@gmail.com, registered an account on “Website A” on November 9, 2014 and was actively logged into the website for 120 hours and 20 minutes between November 9, 2014 and March 3, 2015. The user of this account made approximately six posts to “Website A” including the following:

- a. On November 19, 2014, another user made a post entitled “Mask Girl dildo

¹ The actual name of “Website A” is known to law enforcement. Disclosure of the name of the site would potentially alert its members to the fact that law enforcement action is being taken against the site and its users, potentially provoking members to notify other members of law enforcement action, flee, and/or destroy evidence. Accordingly, for purposes of the confidentiality and integrity of the ongoing investigation involved in this matter, specific names and other identifying factors have been replaced with generic terms and the website will be identified as “Website A.”

² The actual name of the Network is known to law enforcement. The network remains active and disclosure of the name of the network would potentially alert its members to the fact that law enforcement action is being taken against the network, potentially provoking members to notify other members of law enforcement action, flee, and/or destroy evidence. Accordingly, for purposes of the confidentiality and integrity of the ongoing investigation involved in this matter, specific names and other identifying factors have been replaced with generic terms and the network will be identified as “the Network.”

(m2u00297).” Among other things, this post contained a preview image, also known as a contact sheet, containing 16 images. The majority of these images contained child pornography depicting a prepubescent female, including those depicting this female with her legs spread apart, exposing her vagina, which was being penetrated by an orange cylindrical object. In response to this post, on November 19, 2014, the user thedgains replied, stating, “Damn! I wish that little sweetheart would let me give her my REAL cock! I would love to send some of my cum gushing into that young snatch!”

IP Address and Identification of User THEDGAINS on “Website A”

9. A search warrant, authorized by the United States District Court for the Eastern District of Virginia, allowed agents to deploy a Network Investigative Technique (“NIT”) on “Website A”. The NIT allowed agents to identify the actual IP address and other identifying information of the computers used to access “Website A”. Agents found that the username “thedgains” was used from the IP address 174.28.146.6, with a MAC address of 68:94:23:98:C9:B4, computer name of “Private Laptop”, and the user account “user”.

10. Further investigation showed that the IP address, at the time of the login, was owned by CenturyLink and assigned to the Sandia Valley Nazarene Church at 2315 Markham Road SW, Albuquerque, New Mexico 87105. A search of Accurant information database (a public records database that provides names, dates of birth, addresses, associates, telephone numbers, e-mail addresses, etc.) was conducted for thedgains@gmail.com, which did not provide any results. However, a search for erotictoybox@gmail.com (the recovery e-mail address for thedgains@gmail.com) showed a single result for a “Randal Paul” with an address that does not appear to exist.

11. A further search of Accurint information database was conducted for 2315 Markham Rd SW, Albuquerque, New Mexico 87105 (DEFENDANT'S ADDRESS). The search revealed that Randal Gordon Paul (PAUL) lists his current address as the referenced address. It also showed that PAUL is a registered sex offender with two prior convictions:

- a. 8/22/1995 – Lewd and lascivious acts with child under 14
- b. 2/24/1998 – Aggravated sexual abuse

Interview of Randal Paul

12. On September 9, 2015, Special Agents of the FBI interviewed PAUL at DEFENDANT'S ADDRESS. PAUL is employed at the campus of the Sandia Valley Nazarene Church located at the referenced address. During the interview, PAUL explained that he does maintenance work on the campus and also assists in the ministry portion of the campus, meaning that he will present sermons at church meetings on the campus as well as other counseling. PAUL also informed agents of his prior history as a convicted sex offender and that he registers quarterly, as required. PAUL stated that he used e-mail addresses that included rgpaulmail@gmail.com. PAUL also informed agents that he owns a computer, a black ASUS laptop. Agents requested consent to search his computer, and PAUL granted it. However, PAUL informed agents that his wife had the laptop in another part of Albuquerque, and he was unsure when she would return. PAUL also informed agents that he would allow individuals to borrow his laptop and that multiple individuals would keep the laptop for extended periods of time (e.g. overnight or longer). Before completion of the interview, PAUL agreed to allow agents to return on September 10, 2015 to search the laptop.

13. On September 10, 2015, Special Agents of the FBI interviewed PAUL at DEFENDANT'S ADDRESS. During the interview, agents asked for and received consent to search PAUL's laptop.

Agents determined that the MAC address of PAUL's laptop matched the MAC address associated with the "THEDGAINS" account activity on "Website A" described above.

Forensic Search of PAUL's Laptop

14. With PAUL's consent, agents executed a forensic examination of the laptop. The examination revealed approximately 70 images that appear to be child pornography.

15. Agents also discovered three files named: 2015-07-01-4.dc, 2015-07-02-5.dc, and 2015-07-03-6.dc. Based on my training and experience, these files appear to be created by a keystroke logger and contain a record of user keyboard activity from July 1, 2015, July 2, 2015, and July 3, 2015, respectively.

16. The content of the file 2015-07-01-4.dc appears to show that the user of the computer at or about 6:55 pm typed an e-mail in thedgains@gmail.com account. At or about 7:44 pm, the user appears to have logged into a site named "ONLYGIRLSPEDO" using the Tor Browser and the username "thedgains". At or about 7:56 pm, the user appears to then log into a Google account with the username "sarahowensmailbox".

17. The content of the file 2015-07-02-5.dc appears to show an individual, from at or about 8:17 AM through 4:02 pm, preparing a PowerPoint presentation related to a church service and other church management work. At 4:04 pm, the user appears to log into the e-mail account thedgains@gmail.com. Beginning at approximately 7:09 pm, the user appears to have a lengthy conversation via e-mail, using multiple e-mail accounts including thedgains@gmail.com, abqfrozenfan@gmail.com, and deadheaddphillips@gmail.com. The file appeared to show that abqfrozenfan@gmail.com and deadheaddphillips@gmail.com were created by the user of thedgains@gmail.com during this conversation. These conversations included messages that

appeared to reference attachments that were images of child pornography.

18. Also found on the computer was a file named "The #1 Adult Social Network – XXXConnect.pdf". The file showed a modified date of 5/10/2014 at 1:31 PM MDT. The file contained a receipt for signup with XXXConnect.com, showing a billing customer ID of 1647136705. The receipt showed the following identifying information:

- Tawny M ichelle Paul [sic]
- 2315 Markham Rd SW, Albuquerque, NM 87105
- thedgains@gmail.com

Further investigation showed that the transaction that this receipt referred to was paid for from a Wells Fargo account owned jointly by Randal Paul and Tawny Paul.

19. Also found on the computer was a file named "today", located at "C:\User\user\Pictures".

The file was a picture that showed what appears to be a clothed, pre-pubescent female lying on her back, appearing to hold a piece of paper with the words "Today in ABQ 4/23". Further investigation, including the results of a search warrant for another e-mail account showed that this image had been sent as part of a conversation between thenatybrat@gmail.com, an e-mail address found to be connected to thedgains@gmail.com, and another individual.

thenatybrat@gmail.com represented that she was a woman with a niece that was eight years old and willing to have sex with an older man. The image was intended to prove that thenatybrat@gmail.com's story is real.

20. Based on my training and experience and the information provided above, an individual with responsibilities at the church that include giving sermons and property management also accessed multiple e-mail accounts, including thedgains@gmail.com and

abqfrozenfan@gmail.com, within close time proximity of performing work for the church.

Search Warrant Executed on THEDGAINS@GMAIL.COM and

ABQFROZENFAN@GMAIL.COM

21. On October 5, 2015, your affiant obtained a search warrant for the e-mail addresses: thedgains@gmail.com and abqfrozenfan@gmail.com. On October 16, 2015, your affiant received the results. While evaluating the content of the e-mail address abqfrozenfan@gmail.com, your affiant discovered e-mails sent from abqfrozenfan@gmail.com to the ryanleclerc1342@gmail.com. The conversation spanned from July 2, 2015 to July 9, 2015. On July 2, 2015, the user of account abqfrozenfan@gmail.com told ryanleclerc1342@gmail.com that she is seven years old. The user of abqfrozenfan@gmail.com then went on to say that she would like to have sex with an older man.

22. On July 2, 2015 at 10:13pm, the user of abqfrozenfan@gmail.com sent an e-mail to ryanleclerc1342@gmail.com stating the following: "Will you do this to me? I know that it is sperm. This picture is Dillon and Abby. You can't ever tell them I let you see it. Abby told me never to show anybody." The attachment is named whatdillondostome1.jpg and appears to show a pre-pubescent female, completely naked, lying on her back, with what appears to be an adult penis next to her vagina with semen on her torso, hips, and pubic area.

23. The user of the ryanleclerc1342@gmail.com responded with "yea il do that to you in a heart beat."

24. On July 2, 2015 at 10:21pm, the user of abqfrozenfan@gmail.com sent an e-mail to ryanleclerc1342@gmail.com stating the following: "What about this? This is Dillon's sperm inside of Abby's pussy. Will you do this to me too? It is okay if you say no." The attachment is named whatdillondostome2.jpg and appears to show a prepubescent female, with another individuals hands

holding her labia open showing what appears to be semen inside the labia minora and vagina.

25. The user of ryanleclerc1342@gmail.com responded with "il do that too ☺."

26. The search results also contained an e-mail conversation between thedgains@gmail.com and the ryanleclerc1342@gmail.com. The conversation spanned from June 5, 2015 to August 3, 2015 and mostly revolved around sex with pre-pubescent girls. On June 5, 2015, the user of the ryanleclerc1342@gmail.com wrote "I also had this little fling with a 11 yo when I was like 16 17. And it was so good, that's where I figured out I had a thing for young girls. Iv never come across and group of young girls that actually wana to fuck likel I never Thought there were girls like this out here. So it's great!"

27. On June 6, 2015 at 2:55 pm, the user of thedgains@gmail.com account sent a message stating "...I had sex with a girl who was TOTALLY underage and blew a gigantic nut in her little hair-free snatch. AND SHE TOOK PICTURES AND FILMED THE WHOLE THING."

28. On June 14, 2015 at 8:09pm, the user of thedgains@gmail.com sent a message stating "OK. Well if a TOUCH can get you hard, this pic will make you wanna cum... Here is another picture of Lisa. She is the 6 year old from last night that has the Mom who is cool with everything." The attachment is named Lisa-6(1).jpg and shows what appears to be a pre-pubescent female, completely naked, bending over and looking at the camera between her legs, using her right hand to spread her labia majora. The image clearly shows the labia minora and vaginal opening.

29. On June 23, 2015 at 7:34pm, the user of thedgains@gmail.com sent a message containing four attachments named: Minna-6-19-2015#1.png, Minna-6-19-2015#2.png, Minna-6-19-2015#3.png, and Minna-6-19-2015#4.png. All four of these images show what appears to be a pre-pubescent female, completely naked in the bathtub. The image named Minna-6-19-2015#4.png

shows the female on all fours with what appears to be an adult male hand assisting the girl in opening her labia majora. The image clearly shows the labia minor and vaginal opening.

30. Review of the contents of abqfrozenfan@gmail.com also showed a conversation with richard_anthony7@hotmail.com. One e-mail, sent on August 11, 2015 at 11:09 PM MDT, abqfrozenfan@gmail.com contained three attachments. One attachment, named tawny-04.jpg, shows what appears to be a naked, pre-pubescent female, with her legs spread apart, using her hands to hold her knees back and apart, exposing her vagina. Another attachment, named tawny-06.jpg, depicts what appears to be the same naked, pre-pubescent female, lying on her right side, with her legs spread, using her left hand to spread her labia majora, exposing both the labia minora and vaginal opening.

31. Additional investigation showed that abqfrozenfan@gmail.com was created and accessed on or about 7/2/2015 at 7:56 PM MDT. The originating IP address was assigned to DEFENDANT'S ADDRESS. Investigation also showed that thedgains@gmail.com had been accessed on all occasions referenced above from IP addresses that were assigned to DEFENDANT'S ADDRESS.

32. Additional investigation into the content of thedgains@gmail.com showed the following information:

- a. A copy of the receipt found on Paul's computer was found in thedgains@gmail.com account.
- b. On April 4, 2014 at 7:36 PM MDT, rgpaulmail@gmail.com sent an e-mail to thedgains@gmail.com that did not contain any text but did contain an image named "20140404_193544.jpg". The image appears to be a picture of Randal Paul's face that was taken on April 4, 2014 at approximately 7:35 PM MDT on a Samsung smartphone.

The image was edited to blur the eyes then sent in response to a Craigslist advertisement at 7:42 PM along with an image of an adult penis.

- c. On July 26, 2014 at 3:14 AM MDT, rgpaulmail@gmail.com sent an e-mail to thedgains@gmail.com that did not contain any text but did contain an image named "20131010_124820.jpg". The image appears to be a picture of Randal Paul standing on a trail between trees that was taken on October 10, 2013 at 12:48:19 PM. The image was cropped and sent in response to a Craigslist advertisement on July 26, 2014 at 3:21 AM.
- d. On July 26, 2014 at 11:29 AM MDT, rgpaulmail@gmail.com sent an e-mail to thedgains@gmail.com that did not contain any text but did contain an image named "20140726_112829.jpg". The image contained a white piece of paper with the words "Hi Joe! I'm Sarah. Today is 7/26" written in what appears to be purple marker. The paper was sitting on what appears to be a wooden table. To the left of the paper is what appears to be the lower right hand corner of Randal Paul's laptop that agents searched on September 10, 2015. To the right of the paper is what appears to be a set of vice grips. The image was taken on or about July 26, 2014 at 11:28:29 AM.

On February 23, 2016, your affiant received the results of a search warrant for sarahowensmailbox@gmail.com (Case # MR 16-90). During the review of the results, the image, sent by rgpaulmail@gmail.com on July 26, 2014, was cropped to only include the white paper with the words written on it. The cropped image was then added into 2 other images. These images contained a minor female, with her hair in a bun, a yellow and orange flower in her hair, and wearing a green leotard, appearing to hold the paper. These images were then sent from a different e-mail address to

solobron2222@gmail.com on 7/29/2014 at 12:29 AM, in an attempt to prove that the girl in the image, being ten years old, is real and wants to have sex with the user of solobron2222@gmail.com.

- e. On April 3, 2014, in response to a Craigslist advertisement, the user of thedgains@gmail.com account sent a phone number ((505) 433-7077). Further investigation showed that this phone number is associated with Google account randyandtawnypaul@gmail.com.

33. Further review of the logins to thedgains@gmail.com and abqfrozenfan@gmail.com showed that from October 15, 2014 through August 24, 2015, there were 244 logins to these two accounts. 203 of the logins were from IP addresses assigned to the DEFENDANT'S ADDRESS.

34. In my training and experience, the information shown above, including keylog files, e-mail creation and access logs, and the e-mail content discussed show that the individual in control of abqfrozenfan@gmail.com and thedgains@gmail.com are the same individual; that the individual knowingly sent images containing child pornography to ryanleclerc1342@gmail.com; the individual used Randal Paul's computer to send at least some of the images; the user accessed the e-mail accounts from the internet service located at DEFENDANT'S ADDRESS; and the individual in control of the accounts and computer is Randal Paul.

Search Warrant Executed on RYANLECLERC1342@GMAIL.COM

35. On December 7, 2015, your affiant received the results of a search warrant executed on ryanleclerc1342@gmail.com (Case#: MR 15-754). During the review of the results, your affiant found that, on or about June 1, 2015, ryanleclerc1342@gmail.com had posted an advertisement on Craigslist in the casual encounters section. The ad's title was "I will walk to ur[sic] place if

it's not to[sic] far – m4w.” An individual, using the e-mail address sarahowensmailbox@gmail.com, responded via e-mail approximately one hour later stating that she was 12 and wanting to experiment with sex with an older man. sarahowensmailbox@gmail.com also offered to allow ryanleclerc1342@gmail.com to “mess around” with her sister, who is 9 and has not yet started puberty.

36. On June 6, 2015, sarahowensmailbox@gmail.com sent an e-mail to ryanleclerc1342@gmail.com containing two images. The first, named “Guessmyage1.png”, shows what appears to be a prepubescent female completely naked. The female is posed in such a way, that the top portion of the labia minora is visible. The second, named “Guessmyage2.png”, shows what appears to be the same prepubescent female, completely naked, sitting on her heels. The labia minora is visible in this picture as well. It is later stated that the individual in the image is six years old.

37. From talking to sarahowensmailbox@gmail.com, ryanleclerc1342@gmail.com was introduced to other personas, including the following e-mail accounts:

- a. abqfrozenfan@gmail.com – a seven-year-old girl that wanted to have ryanleclerc1342@gmail.com, 22, as a boyfriend and have sex with him.
- b. deadheaddphillips@gmail.com – the cousin of a young girl willing to allow ryanleclerc1342@gmail.com to come and have sex with abqfrozenfan@gmail.com at her apartment. deadheaddphillips@gmail.com also offered to allow ryanleclerc1342@gmail.com to come and have sex with a five-year-old girl that was staying with her.
- c. emailmariohava@gmail.com – a seven-year-old girl that was willing to have sex

with ryanleclerc1342@gmail.com. On July 3, 2015, emailmariohava@gmail.com sent four images to ryanleclerc1342@gmail.com. Two of the images, named "see my pussy-1.jpg" and "see my pussy-2.jpg" show what appears to be a pre-pubescent female, wearing only pantyhose, lying on her left side, with her right leg in the air. The image shows the labia majora and labia minora through the pantyhose. The other two attachments, named "oil on my pussy-1.jpg" and "oil on my pussy-2.jpg", are close-up images of what appears to be the labia majora and labia minora of a pre-pubescent female.

- d. Imalidun99@gmail.com – a friend of thedgains@gmail.com and a mother of a young girl that she offered to allow ryanleclerc1342@gmail.com to meet and, if they had "chemistry", have sex with.
- e. kayleeprathier@gmail.com – an eight-year-old girl and a friend of thenatybrat@gmail.com that wanted to set up a meeting with ryanleclerc1342@gmail.com for sex.
- f. thenatybrat@gmail.com – a nine-year-old girl and sarahowensmailbox@gmail.com's sister who was willing to have sex and produce child pornography with ryanleclerc1342@gmail.com.

38. Further investigation revealed that, combined, from February 4, 2015 through September 5, 2015, the accounts described above were logged into 108 times, with 99 logins coming from IP addresses assigned to the DEFENDANT'S ADDRESS. The remaining logins appear to be through "The Network" or through a proxy that would hide the originating IP address. See Attachment A for a complete list of logins, with date and times, IP address, and location

assigned, if known, for the referenced e-mail accounts. See Attachment B for information related to the creation of each of the referenced accounts, including the name, e-mail address, recovery e-mail address, date created, IP address, and, if known, the subscriber that the IP was assigned to at the associated date and time.

39. Based on my training and experience and the information presented above, ryanleclerc1342@gmail.com was engaged in a conversation with multiple e-mail accounts, all discussing the possession, distribution, and production of child pornography. In addition, the e-mail addresses with which he was in contact, including thedgains@gmail.com, abqfrozenfan@gmail.com, sarahowensmailbox@gmail.com, thenatybrat@gmail.com, and the others listed above, were accessed via internet service from the DEFENDANT'S ADDRESS over a period of approximately eight months.

Search Warrant Executed on RICHARD_ANTHONY7@HOTMAIL.COM

40. On July 18, 2016, your affiant received the results of a search warrant for richard_anthony7@hotmail.com. Richard_anthony7@hotmail.com had posted an ad on Craigslist titled "looking for daddy's girl. – m4w." In response, richard_anthony7@hotmail.com received an e-mail from the e-mail address vinneyhayes@gmail.com, an individual that represented that she was a twelve-year-old girl, interested in having sex with an older man. From this e-mail conversation, richard_anthony7@hotmail.com was introduced to the following personas:

- a. abqfrozenfan@gmail.com – an eight-year-old girl, willing to have sex with richard_anthony7@hotmail.com and provided images of a girl named "Tawny", described above, that appear to be child pornography.

- b. thenatybrat@gmail.com – a seven-year-old girl, named Tawny, willing to have sex with richard_anthony7@hotmail.com and producing child pornography with donthephotodude@gmail.com.
- c. donthephotodude@gmail.com – an adult male, child pornography producer, interested in using richard_anthony7@hotmail.com in his productions.
- d. classiterabq@gmail.com – an adult male that attends “orgies” with pre-pubescent females, and maintained a sexual relationship with a four-year-old girl.
- e. newromey4nm@gmail.com – a six-year-old girl that sent images to richard_anthony7@hotmail.com that appear to be child erotica.
richard_anthony7@hotmail.com then, in response, sent images of his penis, with his hand around it, and what appears to be semen on his hand and penis.

41. Further investigation showed that from on or about April 22, 2015 through March 5, 2016, the above referenced e-mail addresses were logged into 230 times, 122 times from IP addresses assigned to the DEFENDANT’S ADDRESS. The remaining logins appear to be through “The Network” or through a proxy that would hide the originating IP address. See Attachment A for a complete list of logins, with date and times, IP address, and location assigned, if known, for the referenced e-mail accounts. See Attachment B for information related to the creation of each of the referenced accounts, including the name, e-mail address, recovery e-mail address, date created, IP address, and, if known, the subscriber that the IP was assigned to at the associated date and time.

42. Based on my training and experience and the information presented above, richard_anthony7@gmail.com was engaged in a conversation with multiple e-mail accounts, all

discussing the possession, distribution, and production of child pornography. In addition, the e-mail addresses with which he was in contact, including abqfrozenfan@gmail.com, classiterabq@gmail.com, thenatybrat@gmail.com, and the others listed above, were accessed via internet service from the DEFENDANT'S ADDRESS over a period of approximately eight months.

Further Search of Paul's Computer

43. With the information gathered from multiple search warrants, your affiant conducted additional searches on Paul's computer. These searches included searches for the e-mail addresses found during the course of the investigation. Your affiant found that many of the e-mail addresses were found in unallocated space on the computer's disk. These results included the following:

- a. erotictoybox@gmail.com – the text “Inbox(2,530) – erotictoybox@gmail.com – Gmail” appeared approximately ten times. Based on my training and experience, this text appears similar to the title of a Gmail inbox, when accessed via a web browser.
- b. thedgains@gmail.com – the URL <https://mail.google.com/mail/u/0/?tab=wm#search/thedgains%40gmail.com> was found multiple times with the text “Search results – rgpaulmail@gmail.com – Gmail”. Based on my training and experience, this string appears to show that the e-mail account rgpaulmail@gmail.com was searched for the text thedgains@gmail.com.
- c. donthephotodude@gmail.com – a large portion of the text of an e-mail, sent from richard_anthony7@hotmail.com to donthephotodude@gmail.com on 8/24/2015 at

6:55 PM was found. Based on my training and experience, it is likely that the e-mail was opened on this computer.

- d. vinneyhayes@gmail.com – an HTML fragment containing vinneyhayes@gmail.com with the displayed text of “me” was found approximately 8 times. Based on my training and experience, this shows that the account vinneyhayes@gmail.com was logged into from this computer.
- e. thenatybrat@gmail.com – the string “Me and You Wednesday – thenatybrat@gmail.com – Gmail” was found. Based on my training and experience, this shows that a message with the Subject “Me and You Wednesday” was opened from account thenatybrat@gmail.com. “Me and You Wednesday” matches the subject of an e-mail conversation between richard_anthony7@hotmail.com and thenatybrat@gmail.com from August 18, 2015 to August 24, 2015.
 - i. Also found was what appeared to be portions of the text of e-mails sent to and from ryanleclerc1342@gmail.com and thenatybrat@gmail.com on June 1, 2015 and June 20, 2015.

Interview of Pete Myers

44. As part of the investigation, your affiant interviewed Pete Myers, also known as Pastor Pete, Senior Pastor at Sandia Valley Nazarene Church, the organization that owns the DEFENDANT’S ADDRESS. During the interview, Myers informed agents that Paul and his wife, Tawny, came to live on the DEFENDANT’S ADDRESS in 2011 as volunteers. Paul had been living in Lancaster, CA and had heard good things about the mission work being done at the DEFENDANT’S ADDRESS, which acts as a sort of halfway house for individuals that need

assistance. Paul is a volunteer, receives no pay, and is not licensed by the Nazarene Church as a minister due to his prior conviction as a sexual offender. However, the church has given him a local license, which recognizes that Paul has declared a call to ministry.

45. During the interview, Myers also explained that the church provides a wireless network for use, primarily, by people that work at and visit the church. The password is shared with others, so many individuals may access it, but most of the residences on the campus are outside of the range of the wireless signal. However, Paul's residence is attached to the church's office building, within range of the wireless signal provided at the DEFENDANT'S ADDRESS.

Search of 2315 Markham Rd SW, Albuquerque, NM 87105

46. On November 16, 2016, investigators executed a search warrant (16-MR-822) on PAUL's residence at 2315 Markham Rd SW and the connected offices operated by the Sandia Valley Nazarene Church. During the search, investigators found a desktop computer, located in a closet of PAUL's residence. A review of the computer found a file named "[pthc] 11 yo Janina Camping [video 3] by Calugula.avi". The video is approximately 3:49 long and shows what appears to be a young female lying naked on her back on a navy blue sheet. At the beginning of the video, what appears to be a light colored towel is covering the girl's face. The video appears to show adult male hands touching the female, including on the genitals. At approximately 2:24 into the video, the male spreads the female's legs apart and attempts to spread the labia. The female moves her legs to keep this from happening. Based on my training and experience, I estimate that the girl is between nine and twelve years of age.

47. In addition to the video described above, the same computer contained approximately 30 images that appear to be child pornography. One image, named

662931898_daisy_010_083_123_79lo.jpg, showed a naked, pre-pubescent female lying on her left side, with her left leg flat on the ground and her right leg bent, with her right foot in front of her left shin. The girl's labia is clearly visible. Another image, named 66291854_daisy_010_092_123_446lo.jpg, shows what appears to be the same naked, pre-pubescent female lying against a pile of wood, with her legs spread apart. The image is taken from behind the female and is focused on the girl's labia.

48. In addition to the items described above, another computer, a Toshiba laptop, was found in Randal Paul's office. A review of this computer found approximately 25 deleted images that appear to be child pornography.

Stolen Internet Access

49. During the review of thedgains@gmail.com account, your affiant also found conversations related to the theft of internet service from a church. From approximately 11/9/2014 to 11/11/2014, thedgains@gmail.com had a conversation with sarahowensmailbox@gmail.com discussing how he had run radio hardware so that he could use a church's wireless network from his house. This conversation appears to have taken place between two accounts that an individual using PAUL's computer exercised control over. Prior to this conversation, logins to thedgains@gmail.com account could be traced, via IP address, to DEFENDANT'S ADDRESS. After this conversation, from 11/12/2014 to 11/30/2014, logins to thedgains@gmail.com began to come from IP addresses that investigators believe to be an anonymous proxy. Beginning on 12/5/2014, logins to thedgains@gmail.com account could again be traced, via IP address, to DEFENDANT'S ADDRESS.

50. On or about 7/8/2015 thedgains@gmail.com had a conversation with the e-mail account

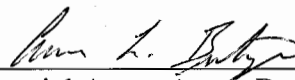
pilorimrsamaster@mail2tor.com. pilorimrsamaster@mail2tor.com was explaining that he was removing his anonymous proxy, which had been stealing internet service from a church. Prior to this conversation, logins to several of the accounts discussed above could be traced, via IP address, to DEFENDANT'S ADDRESS. After this conversation, from 7/11/2015 to 7/17/2015, logins to the e-mail accounts began to come from IP addresses that investigators believe to be either part of "The Network" or an anonymous proxy. Beginning on 7/31/2015, logins to the e-mail accounts could again be traced, via IP address, to DEFENDANT'S ADDRESS.

Conclusion

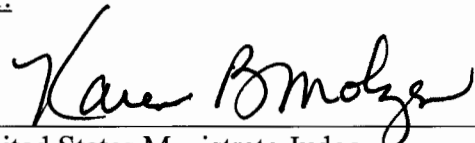
51. Based on the foregoing, your Affiant submits that there is probable cause to believe that RANDAL PAUL violated 18 U.S.C. §§ 2252A(a)(2)(A) and (a)(5)(B). Your Affiant requests an arrest warrant based upon the criminal complaint in this matter.

52. Assistant United States Attorney Jonathan Gerson has authorized federal prosecution in this matter.

53. I swear that this information is true and correct to the best of my knowledge.


Special Agent Aaron Butzin
Federal Bureau of Investigation

Sworn to me this 29th day of November.


United States Magistrate Judge

ATTACHMENT A**E-MAIL ADDRESS LOGIN IP ADDRESSES**

E-mail address	First Date	Last Date	Total Logins	# From 2315 Markham Rd SW
thedgains@gmail.com	2014/10/15-04:59:09-UTC	2015/07/31-15:17:05-UTC	219	181
imalidun99@gmail.com	2015/02/04-22:41:41-UTC	2015/02/04-22:41:41-UTC	1	1
thenatybrat@gmail.com	2015/04/22-22:29:23-UTC	2015/09/05-23:21:46-UTC	48	47
sarahowensmailbox@gmail.com	2015/05/08-18:17:20-UTC	2015/07/31-00:16:31-UTC	20	19
kayleeprathier@gmail.com	2015/06/03-02:14:41-UTC	2015/06/03-02:14:41-UTC	1	1
emailmariohava@gmail.com	2015/06/03-19:18:47-UTC	2015/06/03-19:18:47-UTC	1	1
abqfrozenfan@gmail.com	2015/07/03-01:56:26-UTC	2015/08/24-22:36:52-UTC	25	22
deadheaddphillips@gmail.com	2015/07/03-03:12:52-UTC	2015/07/11-22:32:46-UTC	12	8
vinneyhayes@gmail.com	2015/07/21-07:20:31-UTC	2015/08/10-18:03:49-UTC	24	24
donthephotodude@gmail.com	2015/08/21-04:35:19-UTC	2015/09/06-01:23:56-UTC	14	14
classiterabq@gmail.com	2015/09/26-23:43:20-UTC	2016/03/05-20:20:47-UTC	116	12
newromey4nm@gmail.com	2015/12/01-05:19:08-UTC	2016/03/05-20:26:31-UTC	3	3



ATTACHMENT B**E-MAIL ACCOUNT CREATION INFORMATION**

E-mail Address	Recovery E-mail Address	Date Opened	Opening IP	ISP	Location
erotictoybox@gmail.com	thenatybrat@gmail.com	2009/09/10-20:40:16-UTC	66.102.204.217	Antelecom, Inc.	Lancaster, CA
sarahowensmailbox@gmail.com	thenatybrat@gmail.com	2011/10/01-22:59:36-UTC	98.154.172.38	Time Warner Cable	Palmdale, CA
thedgains@gmail.com	erotictoybox@gmail.com	2013/02/28-23:05:42-UTC	67.132.251.2	National Geographic Visitor Center	Grand Canyon, Arizona
imalidun99@gmail.com	thedgains@gmail.com	2015/02/04-22:41:41-UTC	174.28.146.6	CenturyLink	2315 Markham Rd SW, Albuquerque, NM
thenatybrat@gmail.com	sarahowensmailbox@gmail.com	2015/04/22-22:29:22-UTC	67.0.30.32	CenturyLink	2315 Markham Rd SW, Albuquerque, NM
kayleeprathier@gmail.com	thenatybrat@gmail.com	2015/06/03-02:14:41-UTC	75.161.3.181	CenturyLink	2315 Markham Rd SW, Albuquerque, NM
emailmariahava@gmail.com	thenatybrat@gmail.com	2015/06/03-19:18:47-UTC	75.161.3.181	CenturyLink	2315 Markham Rd SW, Albuquerque, NM
abqfrozenfan@gmail.com	thedgains@gmail.com	2015/07/03-01:56:25-UTC	75.161.3.181	CenturyLink	2315 Markham Rd SW, Albuquerque, NM
deadheaddphillips@gmail.com	thedgains@gmail.com	2015/07/03-03:12:51-UTC	75.161.3.181	CenturyLink	2315 Markham Rd SW, Albuquerque, NM
vinneyhayes@gmail.com	thedgains@gmail.com	2015/07/21-07:20:31-UTC	75.161.17.244	CenturyLink	2315 Markham Rd SW, Albuquerque, NM
donthephotodude@gmail.com	thenatybrat@gmail.com	2015/08/21-04:35:18-UTC	97.123.143.96	CenturyLink	2315 Markham Rd SW, Albuquerque, NM
classiterabq@gmail.com	cassyrocks@aol.com	2015/09/26-23:43:19-UTC	67.0.62.108	CenturyLink	2315 Markham Rd SW, Albuquerque, NM
newromey4nm@gmail.com	classiterabq@gmail.com	2015/12/01-05:19:08-UTC	97.123.206.92	CenturyLink	2315 Markham Rd SW, Albuquerque, NM

